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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. § 846)

MIKE ANGELO MEJIA,
CRISTIAN LOZANO,
ELVIS HERNANDEZ and
ROBERTO JAVIER ISIDORE,

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

REBECCA SHEA, being duly sworn, deposes and says that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about August 13, 2012, within the Eastern District of New York and elsewhere, the defendants MIKE ANGELO MEJIA, CRISTIAN LOZANO, ELVIS HERNANDEZ and ROBERTO JAVIER ISIDORE, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Section 846).

The source of your deponent's information and the grounds for her belief are as follows:^{1/}

1. On or about August 13, 2012, the defendants CRISTIAN LOZANO, ELVIS HERNANDEZ and ROBERTO JAVIER ISIDORE arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard JetBlue flight 826 from Santo Domingo, Dominican Republic. Each was selected for an examination by Customs and Border Protection ("CBP").

2. When defendant CRISTIAN LOZANO was selected for the CBP examination, the defendant CRISTIAN LOZANO presented a black "Swiss" backpack and a small duffle bag for inspection. During examination of the "Swiss" backpack, a CBP officer noticed a strong odor and that the backpack was unusually thick. A probe of one of the panels of the backpack revealed a white powdery substance, which field-tested positive for the presence of cocaine. The total approximate gross weight of the cocaine found in defendant CRISTIAN LOZANO's backpack is 3.264 kilograms.

3. Defendant CRISTIAN LOZANO was placed under arrest. The defendant CRISTIAN LOZANO was advised of his Miranda warnings, which the defendant indicated he understood and agreed to waive. The defendant admitted he knew he was carrying drugs and stated he was to be paid \$8000 to do so. He then stated, in

^{1/} Because the purpose of this affidavit is merely to establish probable cause, I have not set forth all of the facts and circumstances of which I am aware.

sum and substance, that he had been instructed to meet an individual he knew as "Mike", outside the arrival hall of Terminal 4 at JFK airport. CRISTIAN LOZANO admitted that he had imported "pills" on a prior occasion and that the individual he knew as "Mike" was the person who had arranged the prior trip.

4. When defendant ELVIS HERNANDEZ was selected for a Customs and Border Protection ("CBP") examination, the defendant ELVIS HERNANDEZ also presented a black "Swiss" backpack and a small duffle bag for inspection. During examination of the "Swiss" backpack, a CBP officer felt a padded package inside the middle panel. A probe of one of the panels of the backpack revealed a white powdery substance, which field-tested positive for the presence of cocaine. The total approximate gross weight of the cocaine found in defendant ELVIS HERNANDEZ's backpack is 3.351 kilograms.

5. Defendant ELVIS HERNANDEZ was placed under arrest and advised of his Miranda warnings, which he indicated he understood and agreed to waive. The defendant admitted he knew he was carrying drugs and stated he was to be paid \$2000 to do so. He then stated, in sum and substance, that he had been instructed to meet an individual he knew as "Mike", outside the arrival hall of Terminal 4 at JFK airport. ELVIS HERNANDEZ admitted that he had imported "pills" on a prior occasion and


that the individual he knew as "Mike" was the person who had arranged the prior trip.

6. On or about August 13, 2012, ROBERTO JAVIER ISIDORE arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard JetBlue flight 826 from Santo Domingo, Dominican Republic. Defendant ROBERTO JAVIER ISIDORE was selected for a Customs and Border Protection ("CBP") examination. The defendant presented a red and black "Swiss" backpack and a green Gabbiano bag for inspection. During examination of the "Swiss" backpack, a CBP officer noticed a strong odor and that the backpack was unusually heavy and thick. A probe of one of the thick panels of the "Swiss" backpack revealed a white powdery substance, which field-tested positive for the presence of cocaine. The total approximate gross weight of the cocaine found in defendant ROBERTO JAVIER ISIDORE's backpack is 3.423 kilograms. Defendant ROBERTO JAVIER ISIDORE was then placed under arrest. The defendant admitted he knew he was carrying drugs and stated he was to be paid \$3000 to do so.

7. The defendant CRISTIAN LOZANO was by instructed HSI agents to deliver the "Swiss" backpack to "Mike," later identified as defendant MIKE ANGELO MEJIA. On or about 6:30 in the morning of August 13, 2012, a text message was sent to CRISTIAN LOZANO's cell phone, instructing him to go to the left side of the lobby and not to talk to him.

8. Defendants CRISTIAN LOZANO and ELVIS HERNANDEZ subsequently met the defendant MIKE ANGELO MEJIA outside the arrival hall of Terminal 4 at JFK airport as instructed. As the defendants MIKE ANGELO MEJIA, CRISTIAN LOZANO and ELVIS HERNANDEZ were walking towards the parking lot, HSI agents placed MIKE ANGELO MEJIA under arrest. Both LOZANO and HERNANDEZ identified the defendant MIKE ANGELO MEJIA as the individual they knew as "Mike" who had arranged their prior trips to the Dominican Republic.

9. WHEREFORE, your deponent respectfully requests that the defendants MIKE ANGELO MEJIA, CRISTIAN LOZANO, ELVIS HERNANDEZ and ROBERTO JAVIER ISIDORE be dealt with according to law.


REBECCA SHEA
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
13th day of August, 2012

HONORABLE STEVEN M. GOLD
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK